

Draft Agenda for Standardized Water Quality Assessment Methodology Discussion

Goal: Define a standardized methodology to evaluate water quality data for the purposes of CWA 303(d) listing/delisting, water quality-based NPDES permitting requirements (i.e. reasonable potential analysis, assimilative capacity and dilution credits, antidegradation), non-point source program targeting and effectiveness and other program use.

1. Which waterbody types are included in the WQS (HAR 11-54)?
 - a. Types of marine waters
 - b. Future consideration of watershed link to inland waters
2. By waterbody type (ex. open coastal, embayment):
 - a. How do we define the decision unit? What area is representative of the condition (attainment or nonattainment)? Does this vary by pollutant? For inland waters, does this vary by landmark/flow? For coastal waters, does this vary by current, depth? Where there are multiple monitoring stations within the decision unit, should those be considered separately, or averaged together? Would the unit be different for NPDES purposes?
 - b. What is the minimum number of samples needed within each decision unit? Does this differ by pollutant? Does this differ by waterbody type?
 - c. What timeframe of data collection should be considered? Should this be seasonal? Does it vary by pollutant?
 - d. What sources of data can be considered?
 - e. How should the data be compared to the WQS?
 - i. Where the WQS indicates a geomean or other statistically-based period (10% of the time, 2% of the time), should we calculate the data and compare directly?
 - ii. For those WQS without these statistically-based periods, how should the comparison be performed? Would there be an exceedance allowance? If so, would that meet NPDES requirements?
3. Practical Application Case Studies:
 - a. Apply method to assess 3rd party data (for enterococcus?) for Hanalei and compare results to current 303(d) listing.
 - b. Apply method to evaluate nutrient assimilative capacity for a recently issued NPDES permit.